

1 ROB BONTA
Attorney General of California
2 DONNA M. DEAN
Supervising Deputy Attorney General
3 DAVID KLEHM
Deputy Attorney General
4 State Bar No. 165302
TAMMY KIM
5 Deputy Attorney General
State Bar No. 262510
6 600 West Broadway, Suite 1800
San Diego, CA 92101
7 P.O. Box 85266
San Diego, CA 92186-5266
8 Telephone: (619) 738-9733
Fax: (619) 645-2581
9 E-mail: David.Klehm@doj.ca.gov
Attorneys for Defendant State of California,
10 *acting by and through the California Highway*
Patrol (erroneously sued as "State of California")
11 *and Michael Bell*

12 IN THE UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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17 **EDGAR SOLIS,**

18 Plaintiff,

19 v.

20 **COUNTY OF RIVERSIDE; STATE**
21 **OF CALIFORNIA; SALVADOR**
22 **WALTERMIRE; and DOES 1-10,**
inclusive,

23 Defendants.
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5:23-cv-00515-HDV-JPR

**DEFENDANTS' FOURTH
AMENDED WITNESS LIST**

Date: February 18, 2025

Time: 9:00 a.m.

Courtroom: 10D

Judge: The Honorable Hernan
D. Vera

Trial Date: February 18, 2025

Action Filed: 2/02/2023

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants State of California, acting by and through the California Highway Patrol, and Michael Bell hereby serve the following list of witnesses who may be called during trial. Defendants reserve the right to supplement or amend this list.

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Michael Bell, Defendant, CHP Officer	Officer Bell is the defendant and will testify about his interactions with Plaintiff, training and experience with the CHP.	1.25		
Patrick Sobaszek, Detective, Hemet Police Department	Detective Sobaszek will testify about his interactions with and observations of Plaintiff and incident, police tactics used, training and experience as a law enforcement officer, including in SWAT and on the Gang Task Force. Sobaszek is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.	45 mins	45 mins	
Salvador Waltermire, Deputy, Riverside County Sheriff's Department	Deputy Waltermire will testify about his interactions with and observations of Plaintiff and incident, including the third volley of shots, police tactics used, and his training and experience as a law enforcement officer.	45 mins	30 mins	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	Waltermire is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.			
Arthur Paez, Sergeant, Hemet Police Department	Sergeant Paez will testify about his knowledge of Plaintiff, communications with the Gang Task Force concerning Plaintiff, and observations of Plaintiff and the incident, including the third volley of shots, police tactics used, as well as experience as a law enforcement officer. Paez is unique in that he was an eyewitness to various portions of the incident and heard and observed events, including from different angles or perspectives, that others may not have similarly observed.	30-45 min.	45 min.	
M. Vargas, Lieutenant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
D. Harris, Sergeant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Sergeant and knowledge of Defendant Bell's	45 minutes	45 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	tactical training.			
C. Hamilton, Lieutenant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Leader. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
J. Kawanaka, Sergeant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Lead Administrative Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	
Daniel Moody, Detective	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	45 minutes	45 min	
J. Manjarrez, Detective	Riverside County Sheriff Department officials. Collected white bag of powdery substance from plaintiff's car suspected fentanyl and blood sample.	30 minutes	30 min	
A. Dittfurth, Deputy	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	30 minutes.	30 min	
Daniel Cline, Deputy	Riverside County Sheriff Department official involved in the incident investigation,	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	obtained pictures, DNA swab, and Scanner data.			
D. Sandoval, Investigator	Riverside County official involved in the incident investigation, involved in area canvass and investigation.	20 min.	20 min.	
S. Anderson, Investigator	Riverside County official involved in the incident investigation, involved in area canvass and investigation.	20 min.	20 min.	
Jennifer Jerneagan, Lead Forensic Evidence Supervisor	Riverside County Sheriff Department official involved in the incident investigation.	20 minutes	20 min	
Yesika Alvarado, Forensic Evidence Technician	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	40 minutes	40 min	
A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
Venderfees, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of pursuit termination at 632 Taschner Drive	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	and point of rest of plaintiff's car and carport damage.			
Monique Torres, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Went to scene to collect and chart evidence; prepared a scaled 3D diagram.	20 min	20 min	
Sienna Knoll, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Photographed and processed the Mustang.	20 min.	20 min.	
Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
Amy Lim	Riverside University Health System hospital laboratory	15 minutes	15 minutes	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	sample collection of blood and urine from Plaintiff at hospital on date of incident.			
RN Joeallen*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Valenzuela, Paola RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Otteson, Lisa Christine RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
McGuire, Bailey RN*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Wilson, Stephen*	Riverside University Health System concerning collection of blood and/or urine samples from Plaintiff at hospital on date of incident.	15 min.	15 min.	
Richard Doria, Nurse*	Riverside University Health System hospital nurse regarding sample collection of blood and urine from plaintiff at hospital on date of incident.	15 min.	15 min.	
Rogers, Shana Lee NP*	Riverside University Health System hospital nurse	15 min.	15 min.	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	regarding sample collection of blood and urine from plaintiff at hospital on date of incident.			
Wallace, Bradley MD*	Riverside University Health System hospital provider regarding blood samples, and urine sample drug abuse screen of plaintiff at hospital on date of incident.	15 min.	15 min.	
Gonzalez, Reyna Teresa MD*	Riverside University Health System hospital provider regarding blood samples, and urine sample drug abuse screen of plaintiff at hospital on date of incident.	15 min.	15 min.	
Downing, Stephanie Rae, MD*	Riverside University Health System hospital provider regarding urine sample drug abuse screen of plaintiff at hospital on date of incident.	20 mins.	20 mins.	
Albini, Paul Thomas, MD*	Riverside University Health System hospital provider regarding blood samples of plaintiff at hospital on date of incident.	20 mins.	20 mins.	
Custodian of Records*	Riverside University Health System hospital witness concerning the urine sample and blood samples collected from plaintiff on date of incident.	20 mins.	20 mins.	
Kristen Steward, M.S., D-ABFT-FT	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood	30 minutes	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	obtained from Plaintiff.			
Ola Bawardi, M.S.	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 minutes	
Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics applicable to facts of this case.	2 hours	1 hr, 15 min – 1 hr 30 min	
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other medical records pertaining to Plaintiff's injuries.	1 hour	45 min	
Leslie Martinez	Resident of the property where the	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	incident occurred who heard yelling and gunshots.			
Marlene Sue Biggs	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Ana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Liliana Rodriguez	Resident who heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Pearo Rodriguez	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Florina Maria Mandujano	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Thomas Jordan	Resident who provided surveillance video from camera	15 minutes	15 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	mounted to front of residence			
Nidia Santana	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect, having seen him in the area before the incident.	30 minutes	30 min	
Kathy Lynn Cassel	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min	
Jaden Schlig	Resident and eyewitness to portions of incident from 633 Hillmer Drive.	20 min	20 min	

1 Dated: February 3, 2025

Respectfully submitted,

2 ROB BONTA
3 Attorney General of California
4 DONNA M. DEAN
5 Supervising Deputy Attorney General
6 DAVID KLEHM
7 Deputy Attorney General
8 TAMMY KIM
9 Deputy Attorney General

/s/ Tammy Kim

*Attorneys for Defendants State of
California, acting by and through the
California Highway Patrol
(erroneously sued as "State of
California") and Michael Bell*

11 *Indicates that witness will be called only if the need arises.
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CERTIFICATE OF SERVICECase Name: **Edgar Solis v. County of
Riverside, et al.**No. **5:23-cv-00515-HDV-JPR**

I hereby certify that on February 3, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DEFENDANTS' FOURTH AMENDED WITNESS LIST

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 3, 2025, at San Diego, California.

C. Henson
Declarant


Signature

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